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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
(SAN FRANCISCO DIVISION)

15 WALTER SPURLOCK and ANDRE
16 GUIBERT,
17 *Plaintiffs,*

18 v.

19 CITY AND COUNTY OF SAN
FRANCISCO, AIRPORT COMMISSION OF
20 THE CITY AND COUNTY OF SAN
FRANCISCO, KEABOKA MOLWANE in
21 his individual capacity and official capacity as
Aviation Security and Regulatory Compliance
Officer at the San Francisco International
Airport, and JEFF LITTLEFIELD in his
22 individual capacity and official capacity as
Chief Operating Officer at San Francisco
International Airport,

23
24 *Defendants.*

Case No. 3:23-cv-4429
Jury Trial Demanded

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER PORTIONS OF
PLAINTIFFS' SECOND AMENDED
COMPLAINT SHOULD BE SEALED**

Action filed: August 28, 2023

**ADMINISTRATIVE MOTION TO CONSIDER WHETHER PORTIONS OF
PLAINTIFFS' SECOND AMENDED COMPLAINT SHOULD BE SEALED**

Pursuant to Civil Local Rules 79-5 and 7-11, Plaintiffs Walter Spurlock and Andre Guibert, by and through their attorneys, move this Court to consider whether portions of Plaintiffs Second Amended Complaint, and one exhibit thereto, should be sealed. Pursuant to the parties' protective order, Defendant has designated as "Confidential" TSA National Amendment: Centralized Revocation Database for Individual with Revoked Identification Media TSA-NA-21-01A ("TSA-NA-21-01A"). That a Confidential designation has been placed on a federal regulation that governs Plaintiffs' substantive and procedural rights and which underpins Plaintiffs' legal claims is deeply offensive to the American system of open justice. Nevertheless, Plaintiffs have submitted a redacted Second Amended Complaint and identify the following as containing or reflecting information within TSA-NA-21-01A:

| Document title or description | Dkt. No. of redacted version | Dkt. No. of unredacted version | Dkt. No. of decl. in support of sealing | Party with burden to substantiate need to seal | Full or partial sealing sought | Brief statement of reason for sealing (with citation to corresponding declaration in support of sealing) | Granted/Denied (leave blank) |
|-------------------------------|------------------------------|--------------------------------|---|--|--------------------------------|--|------------------------------|
| Second Amended Complaint | 43 | 44-3 | 44-1 | Defendants | Partial | Reflecting information contained within document that Defendants have marked | |

| | | | | | | | |
|---|------------------------------------|------|------|------|------------|--------------------------------|---|
| 1 | | | | | | Confidential (Seham Decl. ¶ 4) | |
| 2 | Second Amended Complaint Exhibit G | 43-7 | 44-5 | 44-1 | Defendants | Full | Marked Confidential by Defendants (Seham Decl. ¶ 4) |

6 Plaintiffs also hereby file a sealed version of a redlined Second Amended Complaint to the
 7 extent it assists the Court. They do not request that the redlined version appear on the public
 8 docket. An unredacted redlined version of the Second Amended Complaint has been shared
 9 Defendants counsel. (Seham Decl. ¶ 5).

10
 11 Dated February 2, 2024

12
 13 Respectfully submitted,

14 JOHN K. BUCHE
 15 BYRON MA
 16 BUCHE & ASSOCIATES, PC

17 LEE SEHAM (*Pro Hac Vice*)
 18 SAMUEL A. SEHAM (*Pro Hac Vice*)
 19 SEHAM, SEHAM, METZ & PETERSEN LLP

20 By: /s/ Samuel A. Seham

21
 22 Attorneys for Plaintiffs

1 CERTIFICATE OF SERVICE

2 I HEREBY CERTIFY that, on February 2, 2024, a copy of the foregoing document was duly served
3 via CM/ECF to the following:

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12 */s/ Samuel A. Seham*
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